

Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.

ORIGINAL

In the Matter of

) MM Docket No. 98-198

Amendment of Section 73.202(b)
Table of Allotments
FM Broadcast Stations
(Cross Plains, Texas)

) RM-
)
)
)

To: Chief, Allocations Branch
Policy and Rules Division
Mass Media Bureau

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

REPLY COMMENTS

Respectfully Submitted,

GULFWEST BROADCASTING COMPANY
SONOMA MEDIA CORPORATION

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SUMMARY

The instant Reply Findings discuss the Counter proposals and related pleadings filed by the Counterproposal date in Docket 98-198. A joint Resolution and Global Settlement was filed by Heftel et al and was opposed herein on the grounds that it was not "global" since all interested parties were not included and that it also relied upon a commitment of station KKAJ which upon analyses was shown to be meaningless and unreliable. The counterproposal by FBM suggested an enormous number of changes (17) including three proposed community changes which were opposed as contrary to the public interest and also, along with all the other channel changes, too disruptive to the existing broadcast service to be adopted. Similar arguments were raised as to the WBAP-BBR proposal as well as noting there the absence of a commitment by the licensee to construct the station if allocated as requested. Finally, Gulf-Sonoma objected to the efforts of FBM to interfere with a voluntary channel change agreement that Gulf Sonoma had from Equicom and had filed in its Counterproposal, and suggested that FBM's actions should be considered adversely by the Commission in this proceeding.

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REPLY COMMENTS

Gulfwest Broadcasting Company, licensee of radio station KVCQ(FM) Cuero, Texas, along with Sonoma Media Corporation, proposed Assignee of KVCQ(FM) 1/ (hereinafter referred to jointly as "Gulf-Sonoma") by their counsel, and pursuant to Sections 1.415 and 1.420 of the Commission's Rules hereby files the instant Reply Comments in the above-captioned proceeding.

According to FCC records, in addition to the Comments and Counterproposal filed by "Gulf-Sonoma" the following pleadings were filed by the Counterproposal date:

1. Counterproposal by First Broadcasting Management, LLC; KCYT-FM License Corp; and Gain-Air, Inc (Hereinafter collectively referred to as "FBM");

2. A Supplement to Counterproposal also filed by the above group referred to collectively as FBM;

1/ The parties have filed an application form 314 requesting FCC approval of the sale.

3. A Joint Counterproposal And Global Resolution of MM Docket Nos. 97-26 And 97-91 filed by Heftel Broadcasting Corporation, Metro Broadcasters-Texas, Inc., Jerry Snyder and Associates, Inc., and Hunt Broadcasting, Inc. (hereinafter referred to collectively as "Heftel"); and

4. A Counterproposal filed by WBAP/KSCS Operating, Ltd., and Blue Bonnet Radio, Inc. hereinafter referred to collectively as "WBAP-BBR").

These Reply Comments will be directed to those filings.

I. Preliminary Statement

The original NPR suggested a change in a single allocation at Cross Plains. The counterproposal by Gulf-Sonoma suggested an upgrade of the original proposal to a higher channel plus a single channel upgrade and community change (from Cuero to Luling) and channel changes at three occupied channel (in Brownwood and San Saba) along with a letter of agreement to the channel change from the San Saba licensee.

In contrast, the Counterproposal by FBM suggested changes in 15 different allocations across two states, while the Counterproposal by WBAP-BBR suggested changes in 17 allocations across two states. While the main thrust of both of those Counterproposals is to change an existing station's community of license to new communities near major cities and within their urbanized areas with major increase in class and coverage to

those major cities from the new selected communities, Neither of the proponents (First Broadcasting for KXGM, and WBAP for KEMM) are the licensee of those stations, and hold only contingent interests in the stations, acquisition apparently contingent and dependent upon successful conclusion of the instant upgrade/community change proposals (See footnote 1 to each counterproposal). We would suggest that this is nothing more than rank speculation in broadcast licenses and should not be an acceptable practice before the commission.

In addition, by the sheer volume of the filings, it has made it virtually impossible to properly review the counterproposals within the 15 day period allowed in the NPR. While 15 days would be more than sufficient under normal circumstances, the proposed combined channel changes between the FBM counterproposal and the WBAP-BBR Counterproposal are beyond that normally and reasonably anticipated in an allocation proceeding and are objectionable for that reason alone. There must be some reasonable limit upon such proposals and whatever that may be it has been surpassed by both of these counterproposals and the Commission should recognize it as such. They are a burden upon the Commission and the other parties and should be rejects for that fact alone. To the extent that each has other deficiencies inherent in their proposals, causing yet more complications, they should be held to a hard line and rejected on that basis.

We will now address the various pleadings individually

II. The Joint Proposal and Global Resolution of 97-26 and 97-91.

Whatever may be the status of Dockets 97-26 and 9791, to the extent that their "Global Resolution" depends upon the Cross Plains allocation being changed to 290C3, it is not "global" and it is not resolved. Furthermore, to the extent that the global resolution depends upon an agreement between the proponents and KKAJ in Ardmore, Oklahoma, that purports to be the consent of that station to the transmitter move, it is illusory at best. Reference to the letter from the licensee indicates that after it indicates it would consent it says the following:

However, Chuckie [the licensee] reserves the right to withdraw its consent to this modification at any time at its sole option without liability of any kind

That, in effect negates the agreement on KKAJ. To further complicate matters, the proponents of the "Global Resolution" refer to Applications for Review and Petitions for Reconsideration pending in Dockets 97-26 and 97-71 and suggest that those filings remain pending while the Commission at the same time consider the alternate way of proceeding by way of a proposed "Global Resolution" in Docket 98-198. Without going farther on it, suffice it to say that the "Global Resolution" is not only internally flawed but is neither global nor a resolution, and it should be given no further consideration in this proceeding.

III. Counterproposal by FBM

The essential goal of the FBM proposal is to upgrade KXGM at Muenster, Texas from its present operation on 293A to a new operation on 294C. If FBM is successful in this maneuver, then it

will proceed to consummate a purchase of the station from Gain-Air, the current licensee. If it is not successful, the sale will apparently not be consummated and FBM will go on its way. In order to accomplish its goal, FBM lists a total of 17 other changes that would be required in existing allocations (FBM, page 4). These proposed changes also include three proposed changes in community of license; KDXT from Granbury to Benbrook, Texas; KZDL from Terrell to Kerens, Texas; and KZDF from McKinney to Campbell, Texas. Time restricts comment on all of the proposed channel changes and other claims included in the FBM proposal except to note that claims of positive benefits in overall increase in population served are more than surpassed by the negative impact in disruption of service that results from 17 station allocation changes (see for example Eatonton & Sandy Springs, Ga., et al 6 FCC Rcd 6580 (1991) where the net gain of 2.2 million people was insufficient to counter the disruption in existing service), and FBM should be rejected on that basis alone.

As for the proposed community changes, we note first that the move from Granbury to Benbrook is from an independent community of 4,045 population located outside of any urbanized area to a town of 19,564 located within the Ft. Worth urbanized area. To compensate Benbrook for its loss of service, FBM submits that it will continue to receive AM service from KPAR(AM). Since Benbrook is located within the Ft. Worth urbanized area, it raises immediate questions as to whether Benbrook is really an independent town or just a de facto part of the city of Ft.

Worth, to be analyzed as such. FBM admits that Benbrook is located adjacent to Ft. Worth, is only 4.4% the population of Ft. Worth, and that only 9.4% of its inhabitants actually work in Benbrook. It is a natural and reasonable conclusion that the remaining 90.6% commute to work in Ft. Worth, and that Benbrook is little more than a retirement/bedroom community of Ft. Worth.

This conclusion is not changed by anything else submitted by FBM. The community has a weekly newspaper and a web page. It has businesses including a funeral home, pest control and car wash that identify themselves with Benbrook; It also has a police chief, fire chief, tax assessor and city manager; for outdoor recreation it has a golf course and for indoor recreation it has a Senior Citizen's Center. It also has three retirement centers, but for hospital services it is necessary to travel to "nearby" hospitals. There is no mention of any school system. Although it sounds like a nice retirement/bedroom community of Ft. Worth, it is no more than that and should not be considered as anything but that.

Indeed, FBM proudly states that acceptance of this change in community would result in a net population gain of service of "756,461" people. Taking out the 19,564 people in Benbrook, that would leave new service to 736,897 people in Ft. Worth and that is precisely the point. Ft. Worth is already well served with existing stations and does not need an additional one at the expense of the people of Granbury. That being the case, there is no justification for the removal of the channel from Granbury and

the significant loss of existing service that would result. As such, the proposed change of community should be denied.

Fairfield and Norwood, Ohio 7 FCC Rcd 2377 (1992), Eatonton and Sandy Springs, supra)

The proposed change from Terrell (population 12,490) to Kerens (population 1,702) would result in the larger town of Terrell losing its fulltime local service to the smaller town of Kerens. FBM indicates that Terrell would be left with an existing AM service. Although Kerens may be considered as a "community" for allocation purposes, that does not justify taking the existing fulltime FM service from the larger community and resulting in a net loss of service to a population of 25,530. FBM refers to this as "inconsequential" but we do not think it to be "inconsequential", especially when the only reason for such a disruption in existing service is to try to make FBM's upgrade at Muenster "fit".

The third change proposes to take the only station licensed to the town of McKinney, Texas, (population 21,283) and relocate it to the "town" of Campbell, Texas (population 683). Again, there is simply no reason nor logic to such a proposed change except as it is necessary to make the overall goal of the upgrade in Muenster "fit". That is not a sufficient reason to justify the disruption of service to the people of McKinney. To make it all work however, FBM proposes to simply make a bookkeeping change relative to noncommercial station KNTU(FM), presently licensed to Denton, Texas.

Without making any change at all in their current operation in Denton, KNTU will simply request that its designated city of license be changed to McKinney. According to FBM, replacing the deletion of McKinney's only local commercial station providing a city grade signal to the community, will be fully offset by the Denton noncommercial station, operated by the University of North Texas, which presently supplies what is referred to by FBM as "an adequate signal" to McKinney, simply changing its stationary to say it is now "licensed to McKinney" rather than to Denton. Therefore, according to FBM, there is no need to look at the ACTUAL loss of service to McKinney, but only at the THEORETICAL loss to Denton (the technical operation of KNTU remaining unchanged).

There has to come a point where the technical slight of hand becomes more than logic can sustain and it is past the point here. Noncommercial service is fine but there is no mistaking what is going on here. Under the FBM proposal McKinney, a town of is to lose its only local station to the "vibrant town" of Campbell, population 683. As set forth in the attached Technical Comments, this one change would result in a total loss of local service to McKinney AND a population net loss of service to 196,383 persons. Associated changes, all needed to make the Muenster change "fit" would result in an additional population net loss of 25,529, yielding a total net loss of population service from this change at 221,912 persons. There is simply no way that this move, so disruptive, so unfair, and so damaging to

the radio service of McKinney and its surrounding area can be justified and it should be rejected out-of-hand.

With the several defects in the Counterproposal, this plan by FBM cannot be adopted and should be rejected.

IV. The WBAP-BBR Counterproposal

This Counterproposal is remarkably similar to the Counterproposal of FBM and suffers the same objections. It has the same speculative approach as FBM, with a proponent (WBAP) seeking major changes in the Table of Allocations, all to move a station (KEMM) to a bigger city urban area with maximized power. According to footnote 1 of the pleading, WBAP holds no present interest in the station but only an option which we presume would be exercised only if it gets its way in this proceeding. In order to seek an upgrade and relocation of KEMM from Commerce Texas, to Allen, Texas, WBAP-BBR proposes 17 station allocation changes to make it all "fit". In fact, as indicated at page 3 of the WBAP-BBR pleading, they have "coordinated" their filing with the "separate but related" filing of FBM as discussed above. According to WBAP-BBR, processing of these two proposals "could minimize confusion" in the case. We think it is just the opposite, maximizing the confusion inherent in both proposals.

As a preliminary matter relative to this Counterproposal we note a major defect in the absence of the required commitment of the licensee (BBR) to construct the new station if the allocation to Allen were granted. Referring to paragraph 4 of the pleading

we note that both WBAP and BBR agree that if the channel allocation is made as requested, that WBAP would agree to file an application to construct. A commitment from the current licensee BBR is noticeably absent and constitutes a major defect in the pleading. Compare the associated pleading of FBM at page 8 where it correctly indicated that FBM AND Gain Air (the current licensee) state their commitment to build the station if the allocation were granted. Absent the commitment of the licensee, the Counterproposal should receive no further consideration. In the interest of a complete record, however, we will continue the discussion of the counterproposal below.

The essential element here is the proposal to move KEMM from its present location in Commerce, Texas, to a new location at Allen, Texas, located at a point where it will place a city-grade signal (70dbu) over ALL of the Denton Urbanized area, AND also penetrate the Dallas/Ft. Worth urbanized area. With such a selected location, and total city grade coverage of the adjacent urbanized area, there is an extremely strong presumption that service will be to that urban area central city, i.e. Denton, (as well as Dallas/Ft. Worth in this case) and should be measured against that standard.

Moreover, Allen has a 1990 U.S. Census population of only 18,309 and is 1.8% the size of Dallas, 4.1% the size of Ft. Worth and 27.8% the size of Denton. Notwithstanding the fact that Allan may be considered a "community" for allocation purposes, it is just as clearly a subsidiary community of Denton and should be

analyzed as such. On such analyses, the removal of the channel from Commerce to Allen fails and should be rejected. Eatonton & Sandy Springs, Ga. et al 6FCC Rcd 6580 (1991); Fairfield and Norwood, Ohio, 7 FCC Rcd 2377 (1992).

The associated numerous channel changes included in the Counterproposal are similarly objectionable in their unwarranted disruption of existing service and for the reasons stated above relative to FBM, constitute separate grounds for rejection of this proposal

V. Interference With Gulf-Sonoma Proposal by FBM

As shown in the Counterproposal filed by Gulf-Sonoma, a written letter of agreement to the channel change proposed at San Saba was included by Equicom, the licensee of the station. The licensee specifically recognized and agreed that the letter could be filed with the FCC for its reliance in this proceeding. Since the time that it was in fact filed, the licensee of KBAL at San Saba has been contacted by FBM who has brought pressure upon the licensee to withdraw its commitment letter to Gulf-Sonoma. By so doing, FBM seeks to artificially limit the FCC's choices in this proceeding by applying undue pressure upon the licensee at San Saba to preclude that licensee from advising the Commission of the fact that it has no objection to the channel change proposed by Gulf-Sonoma.

It is long-settled policy at the Commission that the public interest is best served by presenting the FCC with a choice of

applicants or proposals for broadcast facilities from which the Commission may then select the best, consistent with the public interest. Azalea Corp, 31 FCC 2d 561 (1971); Anax Broadcasting, Inc., 87 FCC 2d 483 (1981). For another party to the proceeding to bring pressure to bear upon a Commission licensee to force that licensee to withdraw its voluntary agreement to a change in channel allocation as a means to remove consideration of a competing counterproposal is flatly contrary to the public interest and to the policy recognized in Azalea and Anax.

The Commission limit on non-consent channel changes as announced in In Re Amendment of FM Table of Allocations Columbus, Nebraska et al, 59 RR 2d 1185 (1986) was based upon the Commission's legitimate interest in reducing uncertainties and complexities in Rulemaking proposals and held that the limit would be observed "absent special factors" which would be considered in any case. As these Reply Comments are being written, we do not know for a fact whether Equicom will yield to the pressure being placed upon them by FBM and withdraw their commitment to Gulf-Sonoma . If they do not, then the processes may proceed as they should. If they do yield to the outside pressure being exerted by FBM and withdraw their letter of voluntary commitment to Gulf-Sonoma, then we submit that such special factors clearly exist here.

First of all, the "multiple channel substitutions that are disruptive to licensees, Commission processes, and the listening public" which was the specific concern expressed by the

Commission in Columbus, are most prevalent by far in the competing proposals in this proceeding rather than the simple proposal offered by Gulf-Sonoma. Secondly, to the extent that the Gulf-Sonoma proposal does in fact resolve short-space, directional problems and increase service to the public, it is clearly in the public interest to be considered and adopted. Thirdly, it must be recognized that the licensee at San Saba has already indicated its complete willingness to make the channel change suggested by Gulf-Sonoma, and has made the same commitment elsewhere in this proceeding to FBM, and may be reasonably expected to do so.

To the extent that FBM seeks to limit the agreement of Equicom to change to channel 291 in San Saba only to FBM's proposal, it is contrary to logic as well as FCC policy. The Commission should recognize the stated willingness of Equicom to make the change in this proceeding whether it results from adoption of the FBM proposal or the Gulf-Sonoma proposal. In fact, rejection of the FBM proposal should end their participation in this proceeding and similarly end their pressure upon the licensee at San Saba. In sum, it would be unacceptable to "reward" the actions of FBM for their attempted interference with Gulf-Sonoma's competing proposal in this proceeding and there are significant and overriding reasons for the Commission to recognize that the San Saba licensee has no real objection to the change in its channel allocation as proposed by Gulf-Sonoma, and to proceed accordingly.

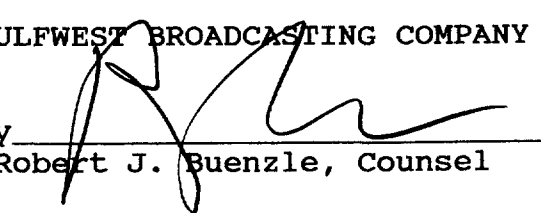
VI. Conclusion

The Counterproposals submitted by FBM and WBAP-BBR are an unreasonable burden on Commission and processes and an unacceptable disruption of existing broadcast service. For these reasons as well as the specific reasons stated above, neither of these proposals should be adopted. The proposal of Gulf-Sonoma would provide an improvement of services without the inordinate disruption of FBM and WBAP-BBR and therefore the Counterproposal of Gulf-Sonoma should be adopted.

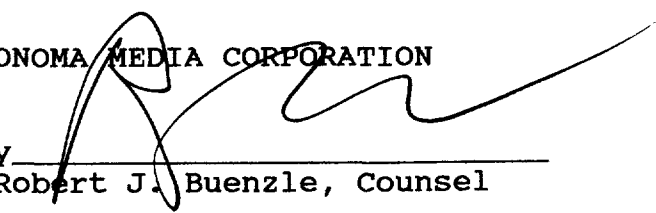
Wherefore, it is respectfully submitted that the counterproposal as submitted by Gulf-Sonoma is in the public interest and should be adopted.

Respectfully Submitted,

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January 5, 1999

TECHNICAL COMMENTS
REPLY TO COUNTER PROPOSAL
MM Docket No. 98-198, RM-9304
January 1999

INTRODUCTION

The reply to comment period (15 days), the voluminous filing material and both the Christmas and New Years Holidays have not allowed time to adequately evaluate the proposals set forth in this MM Docket No. 98-198. We have found several items that should be pointed out to the Commission. These constraints have not allowed adequate time to bring these to the Commission's attention.

This Technical Exhibit supports the Reply to Counter Proposal by Gulfwest Broadcasting Company and Sonoma Media Corporation jointly filing as "CP" in MM Docket 98-198, RM-9304. In the Counterproposal filed in this same docket by First Broadcasting Management, LLC, Gain-Air, Inc. and KCYT-FM License Corporation ("FBM") proposes to change the FM Table of Allotments to 17 communities. One of the proposed changes will delete Channel 295A from McKinney, Texas. This will leave this community without service. FBM proposes to have KNTU (FM) at Denton, Texas to change their city of license from Denton, Texas to McKinney. It does not propose to make any physical changes at KNTU¹ (see letter in Exhibit #1, FBM Counterproposal). Since KNTU does not plan to move its studio's or even its transmitter site from the present location the move of KNTU will be totally on paper.

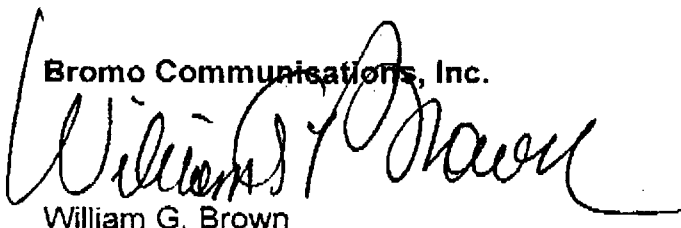
Therefore, McKinney will not receive any new service but only the same service it currently receives from KNTU and McKinney loses KZDF.

CP acknowledges that non-commercial stations may change their city of license with a Form 340 Application. The Commission has a policy that allows non-commercial channels to be substituted for commercial channels in small communities when their only commercial channel was moved to another community. However, in prior cases a new non-commercial channel was added to the community with new non-commercial service replacing the old commercial service. In this case no new service for McKinney is proposed.

The McKinney (KZDF) channel will be moved to Campbell, Texas giving a population net loss of 196,383 persons according to the FBM population figures². In order to assign Channel 296A at Campbell, KZDL³ at Terrell, Texas must change to Channel 295A and change its community of license to Kerens, Texas. In order to assign Channel 295A at Kerens, an assignment at Durant, Oklahoma must change to Channel 292A. The Terrell to Kerns assignment will give a population net loss of 25,529, again using the population figures as filed in the "First" Counter Proposal. Therefore, in order to make the McKinney/Campbell move the population loss will be 221,912 persons.

We are including a map showing the present KZDF coverage and the KTNU. This map clearly shows the major loss of Channel 295A at McKinney.

Bromo Communications, Inc.

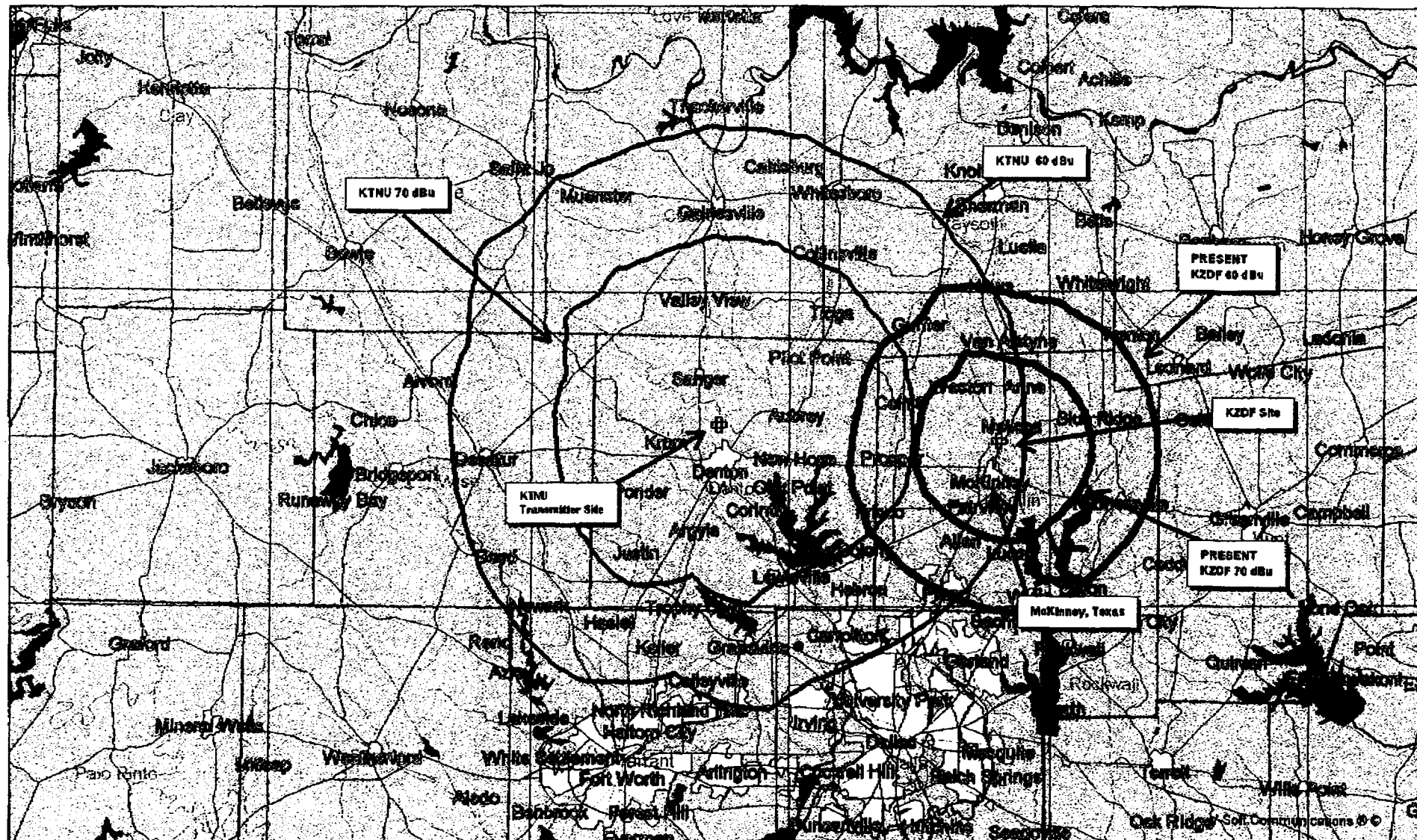


William G. Brown

¹ KTNU is licensed to University of North Texas and operates on Channel 201C1

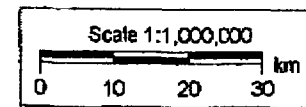
² See FBM Counter Proposal, Exhibit E, Figure 44.

³ KZDF at McKinney and KZDL at Terrell are co-owned.



All contours assume FCC 60/60
Curves and terrain features
using the 3 second database

TECHNICAL COMMENTS
REPLY TO COUNTER PROPOSAL
MM Docket No. 98-198, RM-9304



Bromo Communications, Inc.
January 1999

CERTIFICATE OF SERVICE

I, Robert J. Buenzle, do hereby certify that copies of the foregoing Reply Comments have been served by United States mail, postage prepaid this 5th day of January, 1999, upon the following:

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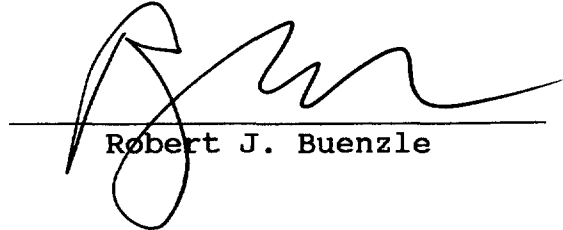
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